

Randall A. Pulman
State Bar No. 16393250
Anna K. MacFarlane
State Bar No. 24116701
PULMAN, CAPPUCCIO & PULLEN, LLP
2161 NW Military Hwy., Suite 400
San Antonio, Texas 78213
Telephone: (210) 222-9494
Facsimile: (210) 892-1610
rpulman@pulmanlaw.com
amacfarlane@pulmanlaw.com

COUNSEL FOR THE GOODMAN DEFENDANTS

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	CASE No. 22-31641-MVL-7
	§	
GOODMAN NETWORKS, INC.,	§	
DEBTOR.	§	CHAPTER 7
<hr/>		
SCOTT M. SEIDEL, TRUSTEE, AND	§	
GNET ATC, LLC,	§	
PLAINTIFFS	§	
	§	
V.	§	
	§	ADVERSARY No. 23-03072-MVL
18920 NW 11TH, LLC; <i>ET AL.</i>	§	
DEFENDANTS	§	

**JAMES GOODMAN’S, PEOPLE NQ, INC.’S, JJC & PEOPLE, LLC’S, AND
GDMN FAMILY INVESTMENTS 2, LLC’S WITNESS AND EXHIBIT LIST
FOR OCTOBER 9, 2024 HEARING ON
TRUSTEE’S MOTION TO COMPEL WRITTEN DISCOVERY RESPONSES AND PRODUCTION OF
DOCUMENTS FROM JAMES GOODMAN, GDMN FAMILY INVESTMENTS 2, LLC, PEOPLE NQ,
INC., AND JJC & PEOPLE, LLC [ECF No. 67]**

COME NOW Defendants James Goodman, (“**J.E. Goodman**”¹), People NQ, Inc. (“**People NQ**”), JJC & People, LLC (“**JJC**”) and GDMN Family Investments 2, LLC (“**GDMN**” and

¹ James Goodman’s full name is James E. Goodman, Jr. Because Mr. Goodman has brothers who were involved with the Debtor and whose first names also start with the letter “J”, for the sake of clarity the Goodman Defendants refer to James Goodman as J.E. Goodman herein.

together with J.E. Goodman, People NQ, and JJC, “**Goodman Defendants**”) and file this, their

Witness and Exhibit List for the hearing on October 9, 2024 on the following matter:

MATTERS TO BE HEARD:

Trustee’s Motion to Compel Written Discovery Responses and Production of Documents from James Goodman, GDMN Family Investments, LLC, People NQ, Inc., and JJC & People, LLC [Dkt. No. 67], and

Goodman Defendants’ Response to Trustee’s Motion to Compel Written Discovery Responses and Production of Documents from James Goodman, GDMN Family Investments, LLC, People NQ, Inc., and JJC & People, LLC [Dkt. No. 81]

GOODMAN DEFENDANTS’ WITNESSES:

Goodman Defendants designate the following witnesses:

1. Anna MacFarlane;
2. Any witness called or designated by any other party;
3. Any rebuttal or impeachment witnesses, as necessary; and
4. Any person present at the hearing.

Goodman Defendants reserve the right to amend or supplement this list at any time prior to the hearing.

GOODMAN DEFENDANTS’ EXHIBITS

Goodman Defendants’ Exhibits are marked with a “G”

Ex. #	Description	Offered	Objection	Admitted/ Not Admitted	Disposition
G-1	James Goodman’s Amended Responses to Trustee’s First Interrogatories				
G-2	James Goodman’s Amended Responses to Trustee’s First Requests for Production				
G-3	People NQ, Inc.’s Amended Responses to Trustee’s First Interrogatories				
G-4	People NQ Inc.’s Amended Responses to Trustee’s First Interrogatories				
G-5	JJC and People, LLC’s Amended Responses to Trustee’s First Requests for Production				

G-6	GDMN Family Investment 2, LLC's Amended Responses to Trustee's First Interrogatories				
G-7	GDMN Family Investment 2's Amended Responses to Trustee's First Interrogatories				
	Any exhibits designated by any other party				
	Any rebuttal or impeachment exhibits				

Goodman Defendants reserve the right to amend or supplement this list at any time prior to the hearing.

Dated October 8, 2024

Respectfully submitted,

PULMAN, CAPPUCCIO & PULLEN, LLP
2161 NW Military Highway, Suite 400
San Antonio, Texas 78213
www.pulmanlaw.com
(210) 222-9494 Telephone
(210) 892-1610 Facsimile

By: /s/ Randall A. Pulman
Randall A. Pulman
Texas State Bar No. 16393250
rpulman@pulmanlaw.com
Anna K. MacFarlane
Texas State Bar No. 24116701
amacfarlane@pulmanlaw.com

**ATTORNEYS FOR JAMES E. GOODMAN,
PEOPLE NQ, INC., JJC & PEOPLE, LLC, AND
GDMN FAMILY INVESTMENTS 2, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of October, 2024, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of this filing to all counsel of record in this case.

/s/ Randall A. Pulman
Randall A. Pulman